

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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STEPHEN ELLICOTT,

Plaintiff,

v.

AMERICAN CAPITAL ENERGY, INC.,  
THOMAS HUNTON and ARTHUR  
HENNESSEY,

Defendants,

and

REDWOOD SOLAR DEVELOPMENT, LLC,

Reach and Apply Defendant.

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Civil Action No. 14-CV-12152

**PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS**

Plaintiff Stephen Ellicott requests that the Court ask the following voir dire questions of potential jurors:

1. Has any prospective juror, or member of the juror's immediate family, ever been employed by American Capital Energy, Inc. ("ACE")?
2. Has any prospective juror, or member of the juror's immediate family, ever provided professional services to ACE whether as an independent contractor or otherwise?
3. Has any prospective juror, or member of the juror's immediate family, ever been involved in any lawsuit, as a party or witness, involving ACE?
4. Has any prospective juror, or member of the juror's immediate family, ever entered into an agreement with ACE?
5. Has any prospective juror, or member of the juror's immediate family, ever been employed by a solar energy company?

6. Has any prospective juror, or member of the juror's immediate family, ever provided professional services to a solar energy company whether as an independent contractor or otherwise?

7. Has any prospective juror, or member of the juror's immediate family, ever been involved in any lawsuit, as a party or witness, involving a solar energy company?

8. Has any prospective juror, or member of the juror's immediate family, ever entered into an agreement with a solar energy company?

9. Has any prospective juror, or member of the juror's immediate family, ever been involved in litigation, as a party or a witness, involving a dispute over wages?

10. Is any prospective juror acquainted in any way with Plaintiff Stephen Ellicott?

11. Is any prospective juror acquainted in any way with Defendant Thomas Hunton, President of ACE?

12. Is any prospective juror acquainted in any way with Defendant Arthur Hennessey, Chief Financial Officer of ACE?

**WHEREFORE**, Plaintiff requests that any juror answering any of the foregoing questions affirmatively be questioned as to the particulars of his or her answer outside the presence of the remaining jurors.

December 21, 2016

Respectfully submitted,

STEPHEN ELLICOTT,

By his attorneys,

/s/ Anthony L. DeProspo, Jr.

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**CERTIFICATE OF SERVICE**

I hereby certify that the attached document was filed through the ECF system and was served electronically to the registered attorneys of record on December 21, 2016.

/s/ Anthony L. DeProspero, Jr.

Anthony L. DeProspero, Jr.